

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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In re FTX Trading Ltd., et al.,

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**RESPONSE TO THE DEBTORS' ONE HUNDRED SIXTH  
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED  
AND/OR UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

1. David Rindlaub, creditor in pro per, hereby submits this response to the Debtor's One-hundred-sixth Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) filed at Docket No. 25703 (the "Objection") by FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors").

2. David Rindlaub (the "Creditor") is an FTX customer and holder of Claim Number 60903 (the "Filed Claim").

3. On March 29, 2023, the Creditor received an email from the Debtors stating:  
"Your claim(s) were scheduled on the Schedules and Statements of West Realm Shires Services Inc. as: USD[2.0016333116810000]"

4. On July 17th, 2023 the Creditor received an email from the Debtors containing notice of September 29, 2023 at 4:00 p.m., Eastern Time as the deadline to file proofs of claim on account of customer claims against the FTX debtors.

5. On September 23th, 2023 the Creditor submitted an Electronic Customer Proof of Claim Form (the "Form") to the Debtors. The Form indicated the Creditor's disagreement with the scheduled quantity of USD fiat of 2.001633311681, due to the non-receipt of a bank transfer withdraw initiated by the Creditor on November 9, 2022 (the "Failed Transfer") in the amount of USD 7253.44. In the Form, the

Creditor asserted a customer claim quantity of fiat of USD 7255.440000000. Together with the Form, the Creditor submitted an image of the Creditor's FTX US account website view showing the Failed Transfer which was not received by the Creditor. The Creditor hereby reasserts that the Failed Transfer was not received by the Creditor.

6. In the Objection the Debtors seek to significantly modify and reduce the value of the Filed Claim from USD 7255.44 to USD 2.001633311681 and indicates the reason as quoted in full below:

"Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records."

7. The Objection should be overruled as to the Filed Claim including for the following two reasons. First, the Objection is generic and makes no reference to the Failed Transfer that is the source of the discrepancy between the claim amount asserted by the Creditor and the modified claim amount requested by the debtor. Second the creditor has supplied no particular information or record that the Failed Transfer was actually completed.

8. The Creditor objects to the proposed treatment of the Filed Claim in the Objection, reserves his right to demand discovery and otherwise with respect to this dispute, if necessary, and respectfully requests that the Court overrule the Objection as to the Filed Claim.


8. The Creditor is aware that this response to the Objection does not meet the response deadline of November 11, 2024 at 4:00 P.M. ET indicated in the Objection. The Creditor received an email from the Debtors on November 21, 2024 instructing the Creditor to log in to the FTX Customer Claims Portal website in order to provide required tax information. Upon logging in, the Creditor observed that the Creditor's entitlement claim amount had not been corrected as per the Creditor's Filed Claim related to the Failed Transfer. After subsequent email correspondence, the Creditor spoke with the Debtors' support staff on November 26, 2024.. The Debtors' support staff explained that there had been an Objection to the Creditor's Filed Claim. Regarding the passed deadline for responding to the Objection, the Debtors

support staff indicated that the Creditor should nevertheless submit his response to the Objection. The Creditor respectfully requests that the court excuse the Creditor's neglect to meet the response deadline and consider the issues and claims herein on their merits, rather than on the basis of this procedural shortcoming.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 5, 2024

David Rindlaub (Creditor in Pro Per)



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Santa Monica, Ca 90403  
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Email: rindlaub@gmail.com

CERTIFICATE OF SERVICE

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding.

A true and correct copy of the foregoing document entitled:

I, Julia Xu, hereby certify that on December 5th, 2024, I caused to be served this document entitled RESPONSE TO THE DEBTORS' ONE HUNDRED SIXTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED AND/OR UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS) via United States Mail by placing true and correct copies thereof in sealed envelopes in the United States mail, first class, postage prepaid, and addressed as follows to the following parties:

Sullivan & Cromwell LLP  
Attn: Christian P. Jensen and David M. Rosenthal  
125 Broad Street  
New York, New York 10004

Landis Rath & Cobb LLP  
Attn: Adam G. Landis and Kimberly A. Brown  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801

Clerk of the United States Bankruptcy Court for the District of Delaware  
824 Market Street, 3rd Floor  
Wilmington, Delaware 19801

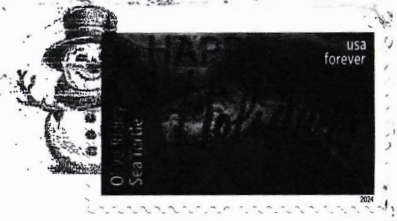
By:  \_\_\_\_\_

Julia Xu  
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